

350 Mount Kemble Avenue
P.O. Box 1917
Morristown, New Jersey 07962
phone: 973-267-0058
fax: 973-267-6442
www.cmg.law



Wall Street Plaza
88 Pine Street, 28th Floor
New York, New York 10005
phone: 212-483-0105
fax: 212-480-3899

Suzanne C. Midlige, Esq.
Direct Dial: (973) 631-6006
Email: smidlige@cmg.law

Patrick A. Florentino, Esq.
Direct Dial: (973) 631-5742
Email: pflorentino@cmg.law

January 24, 2022

Via ECF and E-mail to CronanNYSDCChambers@nysd.uscourts.gov

Hon. John P. Cronan, U.S.D.J
Danial Patrick Moynihan
United States Courthouse
500 Pearl Street
Courtroom 12D
New York, NY 10007-1312

Re: *Medmarc Casualty Insurance Co. v. Clark & Gentry, PLLC, et al.*
Civil Action No. 1:21-cv-07224 (JPC)
LETTER-MOTION FOR THREE WEEK ADJOURNMENT OF IPTC

Dear Judge Cronan:

This firm represents Plaintiff, Medmarc Casualty Insurance Company (“Medmarc”), in the above matter. We write to respectfully request a three-week adjournment of the Initial Pretrial Conference (“IPTC”), which is currently scheduled before Your Honor on February 1, 2022, at 9:30 a.m. (*see* ECF Doc. No. 39).

As the Court is aware, this matter was commenced on August 27, 2021. The original parties to this matter have filed their respective pleadings, participated in a Rule 26(f) discovery conference on December 6, 2021, and prepared a draft Joint Status Letter and draft Civil Case Management Plan, which was to be filed on December 28, 2021. However, as a result of the filing of a Third-Party Complaint on December 28, 2021, by Defendants, Clark & Gentry, PLLC, Edgar C. Gentry, Jr., Celia R. Clark and the Law Offices of Celia R. Clark, PLLC (collectively, the “Clark & Gentry Defendants”), the Court *sua sponte* rescheduled the IPTC from January 4, 2022 to February 1, 2022.

The Third-Party Complaint was then served by the Clark & Gentry Defendants on Third-Party Defendants, Robert Homer, BNC Insurance Agency and Murray, Shoen & Homer, Inc., on January 18, 2022. The Third Party Defendants’ Answer(s) is/are now due February 8, 2022.



Hon. John P. Cronan, U.S.D.J.
January 24, 2022
Page 2

This adjournment request is requested with the consent of counsel for the Clark & Gentry Defendants and Property & Casualty Insurance Company of Hartford (“Hartford”). The reason for this three week adjournment of the IPTC is to provide sufficient time for the Third-Party Defendants to: (1) file their Answer(s); and (2) participate in a new Rule 26(f) discovery conference. The IPTC was originally scheduled for November 2, 2021, but was adjourned to January 4, 2022, in order to address issues Medmarc had related to service on the Clark & Gentry Defendants. As noted above, the IPTC was then adjourned by the Court *sua sponte* from January 4, 2022 to February 1, 2022.

If the adjournment is granted, we will advise all parties of the new date immediately upon initial contact with counsel for the Third-Party Defendants.

We thank Your Honor for consideration of this request. If the Court has any questions with regard to this request, please advise.

Respectfully submitted,
COUGHLIN MIDLIGE & GARLAND LLP


/s/ Patrick A. Florentino
Suzanne C. Midlige
Patrick A. Florentino

cc: All Counsel of Record (*via* ECF)

Plaintiff's unopposed request is granted. The IPTC scheduled in this action for February 1, 2022 is adjourned to February 22, 2022 at 1 p.m. The parties shall submit their proposed case management plan and joint status letter, see Dkt. 14, by February 15, 2022. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261.

SO ORDERED.

Date: January 24, 2022
New York, New York



JOHN P. CRONAN
United States District Judge